DEPARTMENT OF TRANSPORTATION SERVICES

MUFI HANNEMANN
MAYOR

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

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May 21, 2010 RT2/09-299111R

Mr. John Brizdle
3001 Lai Road
Honolulu, Hawaii 96816

Dear Mr. Brizdle:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The identification of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. This letter addresses your comments from the above-referenced submittal.

We agree with your statement that "[i]n order for the D[raft] EIS to provide meaningful information to all the interested parties in this project, the analysis of different options must be carried out with a high level of professionalism." The Council on Environmental Quality (CEQ) recognizes the importance of maintaining the public's faith in the integrity of the EIS process, and avoidance of conflicts in the preparation of EISs is an important means of achieving this goal. As discussed in CEQ's, Guidance Regarding NEPA Regulations, 48 Fed. Reg. 34263 (1983), Section 1506.5(c) prohibits a person or entity entering into a contract with a federal

agency to prepare an EIS when that party has at that time and during the life of the contract pecuniary or other interests in the outcomes of the proposal. The contract for EIS preparation does not include any incentive clauses or guarantees of any future work on the project. As required by CEQ regulations at 40 CFR 1506.5 (c), the contractor preparing the environmental impact statement and alternatives analysis executed a disclosure statement prepared by the City specifying that they have no financial or other interest in the outcome of the project.

Consistent with 40 CFR 1502.14, the City rigorously explored and objectively evaluated all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discussed the reasons for their having been eliminated and devoted substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits. Project scoping was conducted in two phases, as allowed for in FTA guidance related to the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU). Early scoping was completed during the Alternatives Analysis phase and NEPA scoping was completed after selection of the Locally Preferred Alternative. The process is detailed as follows.

The Alternatives Analysis phase, as documented in Chapter 2 of the Final EIS, evaluated a range of modal and general alignment alternatives, including managed lanes, in terms of their costs, benefits, and impacts. The scoping process for the Alternatives Analysis involved a presentation of the viable alternatives to the public and interested public agencies and officials to receive comments on the Purpose and Need, alternatives, and scope of the analysis for the Alternatives Analysis. Scoping followed the FTA process that provides for a culling of alternatives studied in the EIS through an Alternatives Analysis. The following scoping meetings were held as part of the Alternatives Analysis phase of the Project:

- *December 13, 2005: Neal S. Blaisdell Center Pikake Room at 777 Ward Avenue in Downtown Honolulu from 2:00 to 4:00 p.m. (agency scoping meeting)*
- *December 13, 2005: Neal S. Blaisdell Center Pikake Room at 777 Ward Avenue in Downtown Honolulu from 5:00 to 8:00 p.m. (open to the public)*
- *December 14, 2005: Kapolei Middle School Cafeteria at 91-5335 Kapolei Parkway in Kapolei from 7:00 to 9:00 p.m. (open to the public)*

The scoping process initiated for the Alternatives Analysis included a variety of highway, bus and fixed guideway options for consideration. As a result of this scoping effort, the proposed Managed Lane Alternative was expanded. It was revised again during the Alternatives Analysis to improve its performance. Despite the improvements, the managed lane alternative was not able to meet the performance of the fixed guideway.

A second scoping opportunity was initiated in support of the Draft EIS in March of 2007. All meetings held were open to the public:

- *March 28, 2007: Kapolei Hale at 1000 Uluohia Street from 6:00 to 9:00 p.m.*

- *March 29, 2007: McKinley High School at 1039 South King Street from 5:00 to 8:00 p.m.*
- *April 3, 2007 at Salt Lake Elementary School at 1131 Ala Lilikoi Street from 5:00 to 8:00 p.m.*

In this later scoping effort, the public was requested to propose alternatives that would satisfy the purpose and need at less cost or with greater effectiveness, less environmental or community impact and alternatives that were not previously studied and eliminated for good cause. The only alternative that emerged that met these criteria was a fixed-guideway alternative following two alternative alignments. All reasonable alternatives that emerged from these processes were ultimately evaluated in the Draft and Final EISs.

The FTA issued a Notice of Intent to prepare this EIS in the Federal Register on March 15, 2007. All interested individuals and organizations, as well as Federal, State, and Local agencies, were invited to comment on the Purpose and Need to be addressed by a fixed guideway transit system; the alternatives including modes, technologies and alignments to be evaluated; and environmental, social, and economic impacts to be analyzed. The alternatives evaluated in the Draft EIS are the result of the alternatives screening process and reflect comments received during the scoping process, as summarized in the Honolulu High-Capacity Transit Corridor Project National Environmental Policy Act Scoping Report (DTS 2007). Several scoping comments were received requesting reconsideration of the Managed Lane Alternative that was considered and fully evaluated during the Alternatives Analysis phase and found to perform substantially less effectively than the fixed guideway alternative that was selected for further analysis in the Draft EIS. Because no new information was provided that would have changed the findings of the Alternatives Analysis regarding the Managed Lane Alternative, it was not included in the Draft EIS for further consideration. Had information been provided that demonstrated greater effectiveness, the managed lane alternative would have been reconsidered in the Draft EIS.

Regarding alternatives studied, the Alternatives Analysis fully evaluated a reversible Managed Lane Alternative and documented that it performed poorly compared to the Fixed Guideway Alternative on a broad range of metrics. Based on public comments received on the Draft EIS, additional information, as summarized from the Alternatives Analysis Report and Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum, has been added to Chapters 2 and 8 of the Final EIS to explain why this alternative was rejected. Both the Alternatives Analysis Report and Screening Memorandum were available to the public. The following is a quote from Chapter 8, Section 8.6.12, of the Final EIS:

> *"A number of commenters stated that the alternatives studied did not properly address other options for the corridor. In particular, there was a concern that the Managed Lane Alternative was not included in the Draft EIS as an alternative."*

The process of alternatives screening and selection is discussed in Chapter 2 and in Section 8.6.1 [of the Final EIS]. As discussed, alternatives were developed through three general phases: (1) the FTA Alternatives Analysis process; (2) the selection of a Locally Preferred Alternative; and (3) the NEPA scoping and Draft EIS process. The initial screening of

alternatives is documented in the Honolulu High-Capacity Transit Corridor Project Alternatives Screening Memorandum (DTS, 2006a) (Screening Memorandum). The subsequent FTA Alternatives Analysis process is provided in the Honolulu High-Capacity Transit Corridor Project Alternatives Analysis Report (DTS 2006b) (Alternatives Analysis).

The initial screening process considered a wide range of alternatives, including "construction of a 'managed' two-lane elevated structure for transit vehicles and potentially carpools, as well as single occupant vehicles willing to pay a congestion-based toll," as described on page S-2 of the Screening Memorandum. The screening results for the Managed Lane Alternative are discussed on pages C-4 through C-5 of this report. The analysis found that the transit mode share under the Managed Lane Alternative would hold constant with the No Build Alternative; the automobile mode share would increase; and the bike and walk mode share would decrease. Vehicle hours traveled would decrease, while vehicle miles traveled would increase slightly.

This initial screening process identified four alternatives that were presented at scoping meetings held to obtain public input. As described on page 5-2 of the Screening Memorandum, one of the alternatives recommended for further evaluation was the Managed Lane Alternative. The Managed Lane Alternative originally was described as follows:

> *"The Managed Lane Alternative would include construction of a two-lane grade-separated facility between Waiawa Interchange and Iwilei for use by buses, paratransit vehicles and vanpool vehicles (see Figure 5-1). The lanes would be managed to maintain free-flow speeds for buses, while simultaneously allowing High-Occupancy Vehicles (HOVs) and variable pricing for toll-paying single-occupant vehicles. Intermediate bus access points would be provided in the vicinity of Aloha Stadium and Middle Street. Bus operations utilizing the managed lanes would be restructured to use the Managed Lane and enhanced to provide additional service between Kapolei and other points Ewa of Downtown, through to the University of Hawai'i at Manoa."*

The scoping process resulted in the revision of this proposed alternative. As discussed on page 6-1 of the Screening Memorandum:

> *"Based on scoping comments, a second operational option was included under the Managed Lane Alternative. The initial option proposed a two-lane grade-separated facility between Waiawa Interchange and Iwilei which would operate as one lane in each direction at all times of the day. The second option proposes similar infrastructure, but it would operate as a reversible facility with two lanes traveling Koko Head during the morning peak period, and then reversing to travel Ewa in the PM peak period. Both operational options would include restructured and enhanced bus operations by utilizing the managed lanes to provide additional service between Kapolei and other points Ewa of Downtown, and both would be managed to maintain free-flow speeds for buses. Providing that enough capacity existed, High-Occupancy Vehicles (HOVs) and toll-paying single-occupant vehicles would also be allowed to use the facility under either scenario; however, it is possible that under the initial option (one lane in each direction), there would not be enough excess capacity to allow toll-paying single occupant vehicles*

and still maintain reasonable speeds. Intermediate access points would be provided in the vicinity of Aloha Stadium and the Keehi Interchange."

This alternative was further developed in the Alternatives Analysis Report, with additional features added to maximize the performance of the alternative, as discussed on page 2-4:

"The Two-direction Option would serve express buses operating in both directions during the entire day. The Reversible Option would serve peak-direction bus service, while reverse-direction service would use H-1. Twenty-nine bus routes, with approximately 93 buses per hour, would use the managed lane facility during peak hours for either option. One limited-stop route and one local route would continually operate in the managed lane. A total of 27 peak-period express routes would operate in the peak direction using the managed lane facility. Of these, three would be new express routes serving developing areas and nine would be new routes developed for exclusive use of the managed lane. The nine new managed lane express bus system routes would originate from Kalaeloa, Kapolei, or Central Oahu and terminate at the Alapai Transit Center, Waikiki, or UH Manoa. Other peak-period, local and limited-stop routes would follow a route similar to the current structure but would use the managed lane for the line-haul portion of the route.

"A toll structure has been developed that ensures that the managed lane facility would operate to maintain free-flow speeds for buses. To maintain free-flow speeds in the Two-direction Option, it may be necessary to charge tolls to manage the number of HOVs using the facility. For the Reversible Option, three-person HOVs would be allowed to use the facility for free, while single-occupant and two-person HOVs would have to pay a toll."

As discussed on page 3-8 of the Alternatives Analysis Report, the enhanced bus system would include an increased fleet size, estimated at 321 buses beyond the existing fleet for the two-direction managed lane facility and 381 buses for the reversible managed lane facility, to provide a sufficient fleet to ensure that the alternative would function as planned.

Regarding the Managed Lane Alternative in particular, the Alternatives Analysis Report estimated total capital and operating costs for the Managed Lane Alternative. As discussed on page 2-16, capital costs for the Managed Lane Alternative were estimated to range between $3.6 and $4.7 billion, of which $2.6 to $3.8 billion would be for construction of the managed lanes. Transit operating costs for the Managed Lane Alternative would range between approximately $251 and $261 million as a result of additional buses that would be put in service under that alternative. These costs do not include the cost of maintaining the managed lane facility. Capital costs for the Fixed Guideway Alternative, including bus system costs, would range between $5.2 and $6.1 billion for the Full-corridor Alignments, of which $4.6 to $5.5 billion would be for the fixed guideway system. The costs would be $4.2 billion for the 20-mile Alignment, of which $3.6 billion would be for the fixed guideway system. Operating costs for the Fixed Guideway Alternative in 2030, in 2006 dollars, would be approximately $192 million. The

total operating costs for the Fixed Guideway Alternative, including the bus and fixed guideway, would range between approximately $248 and $256 million.

The capital cost of the Managed Lane Alternative thus is potentially somewhat lower than the 20-mile Fixed Guideway Alternative and even lower than the Full-corridor Alternative. Operating costs would be slightly higher. These cost factors were considered in conjunction with other project goals in evaluating the alternatives.

With respect to transit travel time benefit, the Managed Lane Alternative options would improve some trips that were particularly well-served by the managed lanes. In general, the Managed Lane Alternative would increase transit travel times by increasing traffic on the overall roadway system and creating more delay for buses. The H-1 Freeway leading up to the managed lanes would become more congested because cars accessing the managed lanes would increase traffic volumes. Significant congestion would occur where the managed lanes connect to Nimitz Highway at Pacific Street near Downtown. Much of the time saved in the managed lane itself would be negated by the time spent in congestion leading up to the managed lane, as well as exiting the lanes at their downtown terminus. Furthermore, areas that are not directly served by the managed lane would not experience much positive change from the No Build Alternative. As discussed on page 3-14, the Alternatives Analysis Report found that, "although the Managed Lane Alternative would provide some travel-time improvement for certain areas, it has significant limitations with regard to improving travel times or transit service for a broader customer base.

As discussed on page 3-17, transit ridership would increase only 5.3 to 6.4 percent over the No Build Alternative, a small increase compared both to the cost of the Managed Lane Alternative and the increase that would result from the Fixed Guideway Alternative, which would increase transit ridership by 21 percent for the 20-mile alignment.

The volume of peak-hour vehicles in key areas would actually increase under the Managed Lane Alternative compared to the No Build Alternative. As discussed on page 3-27, the Fixed Guideway Alternative would reduce the number of vehicles by 3 to 12 percent.

With respect to the goal of providing equitable transportation solutions that meet the needs of lower-income transit-dependent communities, the Alternatives Analysis Report noted that the Managed Lane Alternative, "would not substantially improve service or access to transit for transit-dependent communities, as buses that use existing HOV facilities would be routed to the managed lane facility but would continue to be affected by congestion in other parts of their routes. Arterial congestion would increase in the study corridor with the Managed Lane Alternative, making bus access to the managed lanes less reliable" (page 6-8).

The Alternatives Analysis Report also considered consistency with existing land use planning and regional transportation planning. On page 6-13, the report concluded that the Fixed Guideway Alternative, "best serves the areas of Oahu that are designated for future growth and development. It is also the only alternative that is consistent with regional transportation system planning defined in the 2030 Oahu Regional Transportation Plan (OMPO 2006a)."

The evaluation of alternatives inevitably involves trade-offs. As stated on page 6-13 of the Alternatives Analysis Report, the "greatest trade-off among the alternatives is between the transportation benefit provided and the cost to implement alternatives. . . . The Managed Lane Alternative provides slightly more benefit [than the Transportation System Management (TSM) alternative, which had little effect on traffic], but at a substantial cost. While the Fixed Guideway Alternative would have the highest cost, it is also the only alternative that would provide a substantial transportation benefit, measured both by the benefit to transit users and in the reduction in congestion compared to the No Build Alternative."

The Alternatives Analysis findings are summarized in Table 2-2 in Chapter 2 of the Final EIS. The Managed Lane Alternative is discussed in Section 2.2.2 of this Final EIS. As stated in the Final EIS and supported by the lengthy analysis that preceded the preparation of the Draft EIS, the Managed Lane Alternative was not pursued because the Managed Lane Alternative would not have achieved project goals and objectives, would not result in substantially fewer environmental impacts, and would not be financially feasible. For all of these reasons, it was not advanced to consideration in the EIS.

Your comments regarding statements made by politicians are not related to the NEPA environmental analysis of the Project. FTA is the federal lead agency and will continue to ensure compliance with NEPA as part of their responsibilities under NEPA and federal law.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,

WAYNE Y. YOSHIOKA
Director

Enclosure